



ACT
Government

Attachment B

**ACT Government Response to the
Intergovernmental Agreement on Biosecurity (IGAB) Review
Draft Report**

January 2017

Background

Introduction

The purpose of the IGAB is to enhance Australia's biosecurity system and strengthen the collaborative approach between the Commonwealth, state and territory governments to address Australia's broad range of biosecurity issues.

The IGAB came into effect on 13 January 2012, signed by the ACT Chief Minister and First Ministers from all jurisdictions except Tasmania.

A review of the IGAB and its schedules is required within five years from commencement, with input from government biosecurity agencies, representatives and bodies, other relevant government agencies, and stakeholders. A report must be prepared and presented to the Commonwealth, state and territory ministers responsible for biosecurity matters (primarily agriculture ministers) and include findings on the implementation and effectiveness of the IGAB and any recommendations for amendment.

In November 2015, the Agriculture Ministers' Forum (AGMIN) agreed to a formal review of the IGAB in 2016 by an Independent Review Panel (the Review Panel). The Review Panel's draft report on the IGAB review was released by the Australian Government for consultation on 16 December 2016, with responses due by 27 February 2017.

The ACT Government has considered the draft report and has provided responses to selected requests for feedback and draft recommendations of significance or interest to the ACT. Other draft recommendations either have limited or no relevance to the ACT, or would be likely to be supported by the ACT. Broader implications of the draft report for the ACT are considered at the end of this submission.

Draft recommendations and requests for feedback. An ACT response has been prepared for items marked with an asterisk*.

No.	Draft recommendations and requests for feedback
Feedback request 1*	The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.
Draft Recommendation 1*	<p>Committee, through an open, transparent and collaborative process, should lead the development of a draft National Statement of Intent for public consultation that outlines:</p> <ul style="list-style-type: none"> • a vision, goal and objectives for the national biosecurity system • principles for managing biosecurity • the meaning and application of 'shared responsibility' • the roles, responsibilities and commitments of participants, including accountability measures • governance arrangements for the national biosecurity system. <p>The process should involve government (including local government), industry and the community.</p>
Feedback request 2	The Review Panel seeks feedback on the total effort and costs associated with demonstrating area freedom by jurisdictions, and the value of that trade.
Draft Recommendation 2	The Primary Industries Technical Market Access and Trade Development Task Group, should seek to enhance engagement with industry to ensure that Australia's market access strategies are aligned appropriately through an agreed priority setting process, and that the degree of transparency and communication is carefully weighed against its level of risk to trade activities.
Draft Recommendation 3	IGAB2 should strengthen consideration of market access requirements within the next NBC work program.
Draft Recommendation 4*	Jurisdictions' biosecurity surveillance activities should include pests and diseases that pose the greatest threat to our export markets.

Draft Recommendation 5	States and territories should utilise (or adapt) the dispute resolution process agreed by ministers in 2012 and include the key elements of that in IGAB2.
Draft Recommendation 6	IGAB2 should clarify the roles and responsibilities of the parties with regard to international and domestic market access, including proof of area freedom.
Draft Recommendation 7*	IGAB2 should include an explicit commitment by jurisdictions to support financially, decisions agreed to under National Environmental Biosecurity Response Agreement (NEBRA), but look to put in place systems that ensure decisions are evidence-based and transparent, in keeping with best risk management principles, and that give confidence to governments and the community that funds are being committed wisely and appropriately.
Draft Recommendation 8*	Jurisdictions should institute formal arrangements between agriculture and environment agencies to define the objectives of cooperation, leading and support roles, information flows, resources and deliverables. The Australian Government agriculture and environment departments should enter into a Memorandum of Understanding, modelled on those with health and immigration agencies.
Draft Recommendation 9*	<p>The IGAB should make clearer commitments to environmental biosecurity and include:</p> <ul style="list-style-type: none">• the principle of ecologically sustainable development• acknowledgement of Australia's international responsibilities under the Convention on Biological Diversity• a program of work to determine, plan and prepare for national priority pests and diseases impacting the environment and native species• a focus on environment and community as well as industry partnerships• invertebrate transmitted diseases as well as animal diseases.

Draft Recommendation 10	The Australian Government should establish the senior, expert position of Chief Environmental Biosecurity Officer within the environment department. A less preferred option is to house the position in the agriculture department. The position should report on the effectiveness of Australia's environmental biosecurity arrangements and achievements. Reports should be made publicly available.
Draft Recommendation 11*	The NBC should establish and resource a new Environmental Biosecurity Committee (EBC), comprising government and external environment biosecurity experts and representatives from both the animal and plant sectoral committees of the NBC, to support the role of the Chief Environmental Biosecurity Officer. The role of the EBC should be reviewed following its work to prioritise national biosecurity risks impacting the environment.
Draft Recommendation 12	Greater and explicit roles should be developed for AHA and PHA in environmental biosecurity, instituted through amended constitutions and expanded board expertise.
Draft Recommendation 13*	Jurisdictions should adopt a systematic approach to determine and plan for national priority animal, plant and environmental pests and diseases.
Draft Recommendation 14*	The NBC should lead five-yearly national-level risk prioritisation for emerging animal, plant and environmental risks and pathways, in partnership with system participants, reporting to AGSOC and AGMIN.
Draft Recommendation 15	The sectoral committees of the NBC, with the endorsement of the NBC, should develop an agreed set of National Biosecurity R&I Priorities, in consultation with system participants and in line with the agreed national priority pests and diseases. Priorities at a sectoral and cross-sectoral level need to be considered. The priorities should be developed within two years of the final IGAB review report, and should be reviewed every five years.

Feedback request 3	<p>The Review Panel seeks feedback on the following options for a new entity for cross-sectoral biosecurity R&I:</p> <p>Option 1: Establishing a new stand-alone entity for cross-sectoral biosecurity R&I.</p> <p>Option 2: Addressing cross-sectoral biosecurity R&I within an existing RDC (for example, the Rural Industries RDC).</p> <p>The Panel also seeks feedback on the funding options and would welcome alternative suggestions.</p>
Draft Recommendation 16*	<p>A future IGAB should remain an agreement between the First Ministers of the Australian, state and territory governments.</p>
Draft Recommendation 17*	<p>First Ministers should, within IGAB2, identify lead ministers and agencies for biosecurity (assumed to be agriculture or primary industries) and require supporting whole-of-government arrangements to be in place, including through memoranda of understanding</p>
Draft Recommendation 18*	<p>First Ministers should formally establish the NBC and articulate its Terms of Reference in the IGAB.</p>
Draft Recommendation 19	<p>The NBC should include the CEO of the Australian Local Government Association, and the New Zealand Government be invited to include a representative.</p>
Feedback request 4	<p>The Review Panel seeks feedback on the proposed Terms of Reference for the NBC</p>
Draft Recommendation 20*	<p>The NBC should adopt a sub-committee structure that aligns with the revised national biosecurity system objectives and national reform priorities in the IGAB. All NBC working groups and expert groups should be task-specific and, wherever possible, time-limited.</p>

Draft Recommendation 21*	The NBC should take steps to increase its public profile and openness, including establishing a stand-alone website. The website could be maintained by, but be separate from, the Australian Government Department of Agriculture and Water Resources, and could accommodate and centralise all information on the NBC, its committees, and their activities. Key policy frameworks, agreements and reports of the NBC should be made publicly available on the site.
Draft Recommendation 22*	AGSOC should establish and provide oversight to an independent IGAB Evaluation Program to assess and report on implementation of each jurisdictions' commitments under the IGAB. The evaluations, or a summary of them, should be made publicly available following ministerial consideration.
Draft Recommendation 23*	The NBC should clarify core commitments of jurisdictions for use in the independent IGAB Evaluation Program to be documented in a future IGAB.
Draft Recommendation 24	The NBC should report annually to AGMIN on its progress of priority reform areas. The NBC's work program and annual report should be made publicly available upon ministerial consideration.
Draft Recommendation 25	AGSOC should establish, as a priority, an Industry and Community Advisory Committee to provide advice to the NBC on key policies and reforms.
Draft Recommendation 26	The NBC should convene a dedicated annual national Biosecurity Roundtable for AHA and PHA members to provide direct input to the NBC.
Draft Recommendation 27	The NBC and the Industry and Community Advisory Committee, in consultation with other key stakeholders, should revise the National Framework for Cost Sharing Biosecurity Activities to enable its practical application.
Draft Recommendation 28	The NBC, with key industry and non-government partners, should agree uniform and fully inclusive categories of funding activity for the national biosecurity system.

Draft Recommendation 29*	The IGAB should include an ongoing commitment to the funding stocktake, with governments publicly reporting their expenditure and the high-level stocktake results under uniform and fully inclusive categories.
Draft Recommendation 30*	All governments should review their current biosecurity expenditure, with a view to redirecting funding into areas that return the highest yields to farmers, industry and the community. This approach will require a planned and coordinated strategy of engagement and communication.
Draft Recommendation 31*	The Risk Return Resource Allocation model should be extended to include all jurisdictions and their investments, with the Australian Government providing assistance to jurisdictions to build national capacity.
Draft Recommendation 32	AHA and PHA should coordinate an industry stocktake of national biosecurity system investments, making the results publicly available.
Feedback request 5*	<p>The Review Panel seeks feedback on the following options to ensure a more rapid-response to an exotic pest or disease incursion:</p> <p>Option 1: Cost-sharing arrangements should provide for four weeks of monitoring, assessment and preliminary control strategies, while an overall assessment is conducted on the possibility of successful eradication.</p> <p>Option 2: Cost-sharing arrangements should include a default funding arrangement for when decisions cannot be quickly reached about the success or otherwise of an eradication program.</p>
Draft Recommendation 33*	The emergency response deeds for aquatic animals and exotic production weeds should be finalised within 12 months.
Draft Recommendation 34*	State and territory governments should review their biosecurity cost-recovery arrangements to ensure they are consistent, appropriate and transparent

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- Draft Recommendation 35* All levels of government could help meet their budgetary challenges by reviewing biosecurity levies and rates/charges currently or potentially applying to system participants. These should be commensurate with agreed national cost sharing principles, which the Review Panel considers should be reviewed.
- Draft Recommendation 36 The NBC should establish a time-limited task group to progress development of a performance framework and performance measures for the national biosecurity system.
- Draft Recommendation 37* The Australian Government should facilitate development of an integrated, national biosecurity information system to provide a common platform for all jurisdictions to share and access biosecurity data and information in the national interest.
- Draft Recommendation 38* Data and knowledge sharing should be a core commitment of jurisdictions under the IGAB. Minimum standards and specifications should be agreed for data sets.
- Draft Recommendation 39 The Australian Government should establish, within the Department of Agriculture and Water Resources, a dedicated National Biosecurity Intelligence Unit, to coordinate and provide advice to the NBC, AGSOC and AGMIN on biosecurity intelligence covering emerging risks and pathways, and international and domestic pest and disease detection.
- Draft Recommendation 40 Jurisdictions should adopt the proposed new priority reform areas and associated work program for IGAB2, and amend the IGAB in line with proposed revisions.
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ACT Government Response to the Intergovernmental Agreement on Biosecurity (IGAB) Review Draft Report

The following summarises the ACT Government's responses to:

Feedback request 1 The Review Panel seeks feedback on the draft roles and responsibilities of national biosecurity system participants.

Response:

The ninth dot point under the first column in Table 1 should be expanded to read *'responding to and controlling detections of exotic pests or diseases that have passed through border controls and are directly related to an imported good', or to a container carrying an imported good at the time of importation.*

The final role/responsibility for the 'General Community' in Table 1 is *'managing declared established pests and diseases, where a community member is a landholder/manager'*. The word *'declared'* should be removed, in keeping with the introduction of general biosecurity obligations to Commonwealth and some states' biosecurity legislation. In the ACT, rural landholders may be required to manage established pests and diseases that are not declared under biosecurity legislation as part of a Land Management Agreement developed under the ACT *Planning and Development Act 2007*.

Draft Recommendation 1 The NBC and the proposed Industry and Community Advisory Committee, through an open, transparent and collaborative process, should lead the development of a draft National Statement of Intent for public consultation that outlines:

- a vision, goal and objectives for the national biosecurity system
- principles for managing biosecurity
- the meaning and application of 'shared responsibility'
- the roles, responsibilities and commitments of participants, including accountability measures
- governance arrangements for the national biosecurity system.

The process should involve government (including local government), industry and the community.

Response:

The ACT Government would support the development of a draft National Statement of Intent, or alternatively a national biosecurity strategy, by governments, industry and the community that outlines the provisions described above.

This overarching document should draw on the current IGAB (IGAB1) for the vision, goal, objectives and principles for managing biosecurity. If the document is to clearly articulate the meaning and application of 'shared responsibility', and the roles, responsibilities, commitments and accountability measures for all participants as well as national governance arrangements, the ACT anticipates it will need to be longer than the 2-4 pages suggested. A national biosecurity strategy could provide a more effective format for achieving clear understanding of the national biosecurity system by government, industry and community stakeholders than a short statement of intent. The ACT notes that the Review Panel recommends development of '*a national biosecurity strategy devised, owned and implemented by governments, industry and the community*' in the longer term (p. 100 of the draft report).

Draft Recommendation 4 Jurisdictions' biosecurity surveillance activities should include pests and diseases that pose the greatest threat to our export markets.**Response:**

The ACT Government has recently established active surveillance programmes for Fruit Fly, Asian Gypsy Moth and Pine Beetle in response to the commencement of international flights into Canberra Airport. The ACT Beekeepers Association maintains sentinel hives to detect bee pests and diseases. Surveillance for other pests and diseases that are not established in the ACT is primarily passive.

The ACT would agree that it is appropriate for jurisdictions' biosecurity surveillance activities to include pests and diseases that pose the greatest threats to export markets. However, in considering this recommendation, the ACT would welcome an indicative estimate in the final report of the number and nature of additional surveillance programmes that could be required in the near future to address known, high-priority, biosecurity-related trade limitations.

Note that the ACT Government does not participate in the Primary Industries Technical Market Access and Trade Development Task Group because its agricultural industry is small and relevant markets are primarily regional. There is, however, an increased opportunity for ACT and NSW high-value agricultural produce to be exported from the ACT with the commencement of international flights.

Draft Recommendation 7 IGAB2 should include an explicit commitment by jurisdictions to support financially, decisions agreed to under NEBRA, but look to put in place systems that ensure decisions are evidence-based and transparent, in keeping with best risk management principles, and that give confidence to governments and the community that funds are being committed wisely and appropriately.**Response:**

The ACT Government has contributed to all NEBRA and NEBRA-like emergency responses where it has been considered an affected party (all national tramp ant eradication programmes). The ACT has also participated in the consultative committees for the Red Witchweed and Four Tropical Weeds Eradication Programmes, as required under Schedule 8 of the NEBRA. The experience of the

ACT representative on the Tramp Ant, Exotic Plant Incursions and Striga (Red Witchweed) Consultative Committees is that jurisdictions have willingly contributed financially to all NEBRA and most NEBRA-like eradication programmes. Response plans have been evidence based, transparent and generally of high quality where adequate information on the environmental risks of the pest, and surveillance and control methods, is available. The ACT understands that the only NEBRA-like response that has not been fully supported by affected parties is the South East Queensland (SEQ) Red Imported Fire Ant (RIFA) Eradication Programme, which has been a long-term, high-cost emergency response. On 20 May 2016, all agriculture ministers noted that it remains in the national interest to eradicate these ants and that it is technically feasible and cost beneficial to do so. Funding of a 10 year eradication plan or a transition to management plan for the SEQ RIFA programme will be considered at the next AGMIN meeting.

Given the high level of participation by jurisdictions in NEBRA and NEBRA-like responses to date, and the fact that all jurisdictions are parties to the NEBRA, the ACT considers that an explicit commitment by jurisdictions to give financial support to decisions agreed under the NEBRA is not warranted in a revised IGAB (IGAB2). The range of pest and disease incursions that could be the subject of a NEBRA response is very broad, and each response needs to be considered on a case-by-case basis.

Draft Recommendation 8 Jurisdictions should institute formal arrangements between agriculture and environment agencies to define the objectives of cooperation, leading and support roles, information flows, resources and deliverables. The Australian Government agriculture and environment departments should enter into a Memorandum of Understanding, modelled on those with health and immigration agencies.

Response:

The ACT would support this recommendation. In the ACT, the Environment, Planning and Sustainable Development Directorate is the lead agency for both environment and agriculture, including biosecurity. The Transport Canberra and City Services Directorate has a role in biosecurity management in urban open space, lakes and ponds. The responsibilities of each agency with respect to biosecurity have been agreed through a Memorandum of Understanding (MoU).

The ACT also has a MoU with NSW to establish and support a collaborative working relationship related to cross-border biosecurity management, including clarifying roles and responsibilities, and developing and strengthening practical cooperation and sharing of resources.

Draft Recommendation 9 The IGAB should make clearer commitments to environmental biosecurity and include:

- the principle of ecologically sustainable development
- acknowledgement of Australia's international responsibilities under the Convention on Biological Diversity
- a program of work to determine, plan and prepare for national priority pests and diseases impacting the environment and native species
- a focus on environment and community as well as industry partnerships
- invertebrate transmitted diseases as well as animal diseases.

Response:

The ACT would strongly support the inclusion of clearer commitments to environmental biosecurity in any revision of the IGAB. Over 50 per cent of the ACT is managed for conservation purposes, including the protection of high-value biodiversity assets. The management of environmental weeds and pest animals accounts for the majority of the ACT Government's biosecurity budget.

Draft Recommendation 11 The NBC should establish and resource a new Environmental Biosecurity Committee (EBC), comprising government and external environment biosecurity experts and representatives from both the animal and plant sectoral committees of the NBC, to support the role of the Chief Environmental Biosecurity Officer. The role of the EBC should be reviewed following its work to prioritise national biosecurity risks impacting the environment, and

Draft Recommendation 20 The NBC should adopt a sub-committee structure that aligns with the revised national biosecurity system objectives and national reform priorities in the IGAB. All NBC working groups and expert groups should be task-specific and, wherever possible, time-limited.

Response:

The draft report recommends the establishment of an EBC, comprising government and external environmental biosecurity experts and representatives from both the animal and plant sectoral committees of the National Biosecurity Committee (NBC). The EBC would have responsibility for non-production based terrestrial, aquatic and marine pests (including invertebrates) and diseases. The draft report also suggests that the Animal Health and Plant Health Committees (AHC and PHC) be renamed as the Animal Biosecurity Committee (ABC) and Plant Biosecurity Committee (PBC), with an expanded role to consider pest animals and weeds in production systems, in addition to pests and diseases of plants and animals in production systems. The draft report states that the work of the Invasive Plants and Animals Committee (IPAC) is mature, and implies that IPAC could be disbanded (p. 63). The Review Panel appears to understand that IPAC only considers established pest animals and weeds, which is incorrect. IPAC also considers surveillance for, and prevention and containment of, new incursions of pest animals and weeds.

The ACT would not support the proposed revised sectoral committee structure under the NBC because it would be impractical for small jurisdictions to provide representation across the EBC, ABC and PBC. Different staff and agencies, or areas within agencies, generally provide the expertise in animal health, plant health, and pest animals and weeds (and also marine pests and diseases although this is not an issue for the ACT). The current ACT IPAC member envisages having to attend all three committees to provide ACT input on weeds and pest animals in production and non-production systems should the proposed structure be adopted. Similarly, current PHC and AHC members would have to participate in the EBC to provide advice on environmental pests and diseases of plants and animals, in addition to their participation in the PBC or ABC.

As a small jurisdiction, providing committee representation throughout the national biosecurity governance structure is a continuing challenge. For example, one ACT Government officer currently provides ACT representation on the following committees:

- IPAC;
- Tramp Ant Consultative Committee;
- Exotic Plant Incursions Consultative Committee;
- Striga (Red Witchweed) Consultative Committee;
- NEBRA Review Admin Group; and

- National Carp Control Plan Policy Advisory Group.

On p. 64 of the draft report, the Review Panel comments that '*...the [NBC] is perhaps overly reliant on key people...*'. This comment could also apply to the sectoral committees. Smaller jurisdictions have limited capacity and a narrower range of capability to contribute meaningfully to the delivery of committee workloads.

The ACT Government would strongly support streamlining the national biosecurity governance structure to allow for effective delivery of agreed biosecurity outcomes with the most efficient representation by jurisdictions on sectoral committees. The ACT recommends that the current NBC sectoral committees remain in place, with AHC, PHC and IPAC considering biosecurity issues in both production and non-production systems (this already occurs routinely within IPAC and to a lesser extent within AHC and PHC). The Emergency Animal Disease Response Agreement (EADRA) and the Emergency Plant Pest Response Deed (EPPRD) could be modified to include provisions for responses to pest animal and weed incursions in production systems (many of the industry signatories would be the same; the draft exotic production weed deed could be incorporated into the EPPRD; the draft aquatic emergency animal disease response agreement could be incorporated into the EADRA).

To this end, the ACT would support greater and explicit roles being developed for Animal Health Australia (AHA) and Plant Health Australia (PHA) in relation to pest animals and weeds in production systems, as well as environmental biosecurity (Draft Recommendation 12). Representation for consultative committees established to consider emergency responses under the EADRA, EPPRD and NEBRA could be drawn from the AHC, PHC and IPAC as required.

Draft Recommendation 13 Jurisdictions should adopt a systematic approach to determine and plan for national priority animal, plant and environmental pests and diseases.

Response:

The Review Panel appears to be unaware of work completed to prioritise Weeds of National Significance (WoNS; <http://weeds.ala.org.au/WoNS/>), many of which are environmental, and work to develop the National Categorisation System for Invasive Species (NCSIS; <http://www.pestsmart.org.au/national-categorisation-system-for-invasive-species/>). The NCSIS provides the rationale for national prioritisation of weeds and pest animals. The Invasive Plants and Animals Committee considers listing and de-listing of WoNS and Established Pest Animals of National Significance. The Review Panel may wish to modify the draft report to include these examples of progress towards national prioritisation of pests and diseases.

Draft Recommendation 14 The NBC should lead five-yearly national-level risk prioritisation for emerging animal, plant and environmental risks and pathways, in partnership with system participants, reporting to AGSOC and AGMIN.

Response:

The ACT would support, in principle, national-level risk prioritisation for emerging animal, plant and environmental risks and pathways. There would be much efficiency to be gained from a national risk assessment process that considers invasive species at all points along the invasion curve, from preventing risk of entry into Australia to managing established pests and diseases on a sound risk

management basis. A national risk assessment process would alleviate the need for individual jurisdictions to duplicate this work.

The key problem is that risk assessments are highly labour intensive and jurisdictions, including the ACT, have struggled to direct diminishing resources towards this activity in recent years. An example can be found in the *List of Exotic Vertebrate Animals in Australia 2007* (<http://www.pestsmart.org.au/list-of-exotic-vertebrate-animals-in-australia/>). Nationally-endorsed risk assessments have only been completed for a small proportion of the species listed. There have been no new nationally-endorsed risk assessments since 2011.

Should Draft Recommendation 14 be adopted, the success of its delivery would depend on securing additional and dedicated resources. The ACT is of the opinion that undertaking this work as described in the draft report would extend current sectoral committees beyond their capacity. Additional and dedicated resources could potentially be secured through a national cost-sharing arrangement under AGMIN. ACT agreement to AGMIN cost-sharing arrangements is subject to budget processes.

Draft Recommendation 16 A future IGAB should remain an agreement between the First Ministers of the Australian, state and territory governments.

Response:

The IGAB requires a strong mandate and the ACT would support any future revision remaining as an agreement between First Ministers.

Draft Recommendation 17 First Ministers should, within IGAB2, identify lead ministers and agencies for biosecurity (assumed to be agriculture or primary industries) and require supporting whole-of-government arrangements to be in place, including through memoranda of understanding

Response:

The lead ACT minister for biosecurity is the Minister for the Environment and Heritage, who has portfolio responsibility for environment and agriculture, and is the ACT AGMIN member. See also comments made in relation to Draft Recommendation 8. The ACT's current administrative arrangements are such that there would be no difficulty for the ACT in supporting Draft Recommendation 17.

Draft Recommendation 18 First Ministers should formally establish the NBC and articulate its Terms of Reference in the IGAB.

Response:

The ACT would support this recommendation. Having First Ministers formally establish the NBC would raise awareness of the national importance and resource requirements of biosecurity and give more visibility to the NBC's work programme.

Draft Recommendation 21 The NBC should take steps to increase its public profile and openness, including establishing a stand-alone website. The website could be maintained by, but be separate from, the Australian Government Department of Agriculture and Water Resources, and could accommodate and centralise all information on the NBC, its committees, and their activities. Key policy frameworks, agreements and reports of the NBC should be made publicly available on the site.

Response:

The ACT would support establishing a stand-alone website. The work of the NBC is instrumental in maintaining a coordinated, united front to the threats presented by new pests and diseases. The new website should NOT be technical in nature. It should be image and video based, and be written in plain English with appropriate resourcing to be kept current.

Draft Recommendation 22 AGSOC should establish and provide oversight to an independent IGAB Evaluation Program to assess and report on implementation of each jurisdictions' commitments under the IGAB. The evaluations, or a summary of them, should be made publicly available following ministerial consideration, and

Draft Recommendation 29 The IGAB should include an ongoing commitment to the funding stocktake, with governments publicly reporting their expenditure and the high-level stocktake results under uniform and fully inclusive categories.

Response:

The ACT would support in principle Recommendations 22 and 29 but queries whether the cost of establishing an independent assessment panel (Draft Recommendation 22) would outweigh any potential benefits from improved outcomes in IGAB delivery. The ACT suggests a benefit: cost analysis should be undertaken before Draft Recommendation 22 is considered for adoption.

If IGAB2 includes an ongoing commitment to continue the annual biosecurity stocktake for each jurisdiction with public reporting of the results (Draft Recommendation 29), the ACT suggests this could provide sufficient accountability to the broader Australian community without incurring the costs of independent assessors. The stocktake could be broadened to include reporting of IGAB implementation outcomes that are additional to the categories of funding provided.

Draft Recommendation 23 The NBC should clarify core commitments of jurisdictions for use in the independent IGAB Evaluation Program to be documented in a future IGAB.

Response: See comments for Draft Recommendation 22. The NBC could clarify core commitments of jurisdictions through the annual stocktake process and these could be documented in a future IGAB.

Draft Recommendation 30 All governments should review their current biosecurity expenditure, with a view to redirecting funding into areas that return the highest yields to farmers, industry and the community. This approach will require a planned and coordinated strategy of engagement and communication.

Response:

The ACT understands that the intention of this draft recommendation is for governments to review their current biosecurity expenditure, with a view to redirecting funding away from the management of established pests and diseases and toward the left hand side of the invasion curve, i.e. toward preventing, detecting, eradicating and containing incursions, which is generally more cost effective. However, the way this recommendation is worded, that governments redirect '*...funding into areas that return the highest yields to farmers, industry...*' could be misconstrued as an inappropriate use by governments of public funds for primarily private benefits. Also, governments have a responsibility to manage established pests and diseases on public land where they have negative impacts on high-value public assets such as biodiversity. The majority of land in the ACT is managed by government for conservation purposes.

The ACT suggests that this recommendation is reworded in the final report to acknowledge that governments also have a responsibility to protect high-value public assets from established pests and diseases, and to indicate the intention of the Review Panel without the need for the reader to examine the accompanying text.

Draft Recommendation 31 The Risk Return Resource Allocation model should be extended to include all jurisdictions and their investments, with the Australian Government providing assistance to jurisdictions to build national capacity.

Response:

Section 8.3.2 and Appendix D of the draft report do not provide sufficient information on the Risk Return Resource Allocation model to allow the ACT to comment on this draft recommendation.

Feedback request 5 The Review Panel seeks feedback on the following options to ensure a more rapid-response to an exotic pest or disease incursion:

Option 1: Cost-sharing arrangements should provide for four weeks of monitoring, assessment and preliminary control strategies, while an overall assessment is conducted on the possibility of successful eradication.

Option 2: Cost-sharing arrangements should include a default funding arrangement for when decisions cannot be quickly reached about the success or otherwise of an eradication program.

Response:

The ACT considers that Option 2 is preferable to mitigate jurisdictions being invoiced for multiple incursions that are subsequently found not to be technically feasible, cost beneficial, nationally significant or in the national interest to eradicate. The ACT acknowledges that it is desirable for combat jurisdictions to receive cost-shared support for the initial phase of an emergency biosecurity response as soon as possible. The ACT is also aware that delays in certainty about whether initial costs for monitoring, assessment and initial control will be reimbursed can deter private landholders/businesses from reporting incursions and participating in a response.

A default funding arrangement (Option 2) could include a provision that, if a consultative committee is unable to decide whether a pest or disease is eradicable or ineradicable within a specified time after it is first convened (e.g. 1-2 weeks), a 4-6 week initial cost-sharing arrangement should

commence from the date of the initial notification by the combat jurisdiction to the relevant Australian Government Chief Officer.

Draft Recommendation 33 The emergency response deeds for aquatic animals and exotic production weeds should be finalised within 12 months.

Response:

As suggested in relation to Draft Recommendations 11 and 20, national consideration could be given to whether the exotic production weed and aquatic emergency animal disease response deeds could be incorporated into the Emergency Plant Pest Response Deed (EPPRD) and the Emergency Animal Disease Response Agreement (EADRA), respectively. For the exotic production weed deed in particular, many of the industry signatories would be the same as for the EPPRD. The ACT notes the Review Panel's recommendation on p. 100 of the draft report for '*one emergency preparedness and response agreement for the national priority animal, plant and environmental pests and diseases*'. Incorporating the draft exotic production weed and aquatic animal deeds into the EPPRD and EADRA, respectively, could be the first step in this direction.

Draft Recommendation 34 State and territory governments should review their biosecurity cost-recovery arrangements to ensure they are consistent, appropriate and transparent.

Response:

The ACT would support this draft recommendation. ACT rural landholders pay a stock levy that supports government provision of veterinary services and assistance with the control of established weeds and pest animals, including technical advice and poison baits for pest animals. The stock levy is reviewed annually.

Draft Recommendation 35 All levels of government could help meet their budgetary challenges by reviewing biosecurity levies and rates/charges currently or potentially applying to system participants. These should be commensurate with agreed national cost sharing principles, which the Review Panel considers should be reviewed.

Response:

The ACT has no biosecurity levy other than the stock levy. The ACT would be unlikely to introduce any new biosecurity levies (for example an emergency incursion levy) within the five-year period envisaged by the Review Panel for implementation of the draft recommendations. The ACT has introduced a number of new levies to the community in recent years and the cost of other taxes and levies has increased more than the wage price index.

Draft Recommendation 37 The Australian Government should facilitate development of an integrated, national biosecurity information system to provide a common platform for all jurisdictions to share and access biosecurity data and information in the national interest.

Response:

The ACT would support this draft recommendation in principle. However, the ACT contributed financially to the development of the BioSIRT (Biosecurity Surveillance, Incident Response and Tracing) software programme through a national cost-sharing arrangement agreed under the former Primary Industries Ministerial Council. BioSIRT is little used by jurisdictions, which now have a range of alternative systems in place. A common national biosecurity system would need to 'talk' to jurisdictional biosecurity information systems already in use, and be sufficiently flexible and adaptable to remain effective in the long term.

Draft Recommendation 38 Data and knowledge sharing should be a core commitment of jurisdictions under the IGAB. Minimum standards and specifications should be agreed for data sets.

Response:

The ACT supports the development of minimum standards and specifications for biosecurity datasets under AGMIN.

Broader Implications of the Draft Report for the ACT

The ACT supports in principle assisting Australia's biosecurity system to remain strong and focussed, and build national capability and capacity to address future challenges. The ACT's primary concern is its capability and capacity as a small jurisdiction to deliver on the proposed recommendations within the draft report should they be adopted through a revised IGAB2.

The ACT has already identified potential constraints in relation to Draft Recommendations 11, 14 and 20. The ACT notes that other draft recommendations have the potential to require a substantial increase in input from jurisdictional AGSOC, NBC, PHA/AHA, sectoral committee and consultative committee members. These draft recommendations include:

- NBC leading the development of a National Statement of Intent (Draft Rec. 1);
- jurisdictions' biosecurity surveillance activities should include pests and diseases that pose the greatest threat to our export markets (Draft Rec. 4);
- the IGAB should include a programme of work to determine, plan and prepare for national priority pests and diseases impacting on the environment and native species (Draft Rec. 9);
- sectoral committees should develop an agreed set of National Biosecurity Research & Innovation Priorities within two years of the final report, to be reviewed every five years (Draft Rec. 15);
- revision of the IGAB (multiple draft recommendations);
- NBC should take steps to increase its public profile (Draft Rec. 21);
- AGSOC should establish and provide oversight of an independent IGAB Evaluation Programme (Draft Rec. 22);
- AGSOC should establish an Industry and Community Advisory Committee (Draft Rec. 25);
- NBC should convene an annual national Biosecurity Round Table to obtain AHA and PHA input (Draft Rec. 26);
- NBC should revise the National Framework for Cost Sharing Biosecurity Activities (Rec. 27);
- the Risk Return Resource Allocation model should be extended to all jurisdictions and their investments (Draft Rec. 31);

- exotic production weed and aquatic animal response deeds should be finalised in 12 months (Draft Rec. 33);
- NBC should establish a time-limited task group to progress development of a performance framework and performance measures (Draft Rec. 36); and
- data and knowledge should be shared by jurisdictions in accordance with agreed minimum standards and specifications (Draft Rec. 38).

The ACT reiterates its strong support for streamlining the national biosecurity governance structure to allow for effective delivery of agreed biosecurity outcomes with the most efficient representation by jurisdictions on sectoral committees.

Should NBC agree to clarify the core commitments of jurisdictions (Draft Recommendation 23), these commitments should recognise the variable capacity and capability of jurisdictions to contribute towards the national biosecurity system (refer Section 7.2.4 of the draft report).